

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

Larry G. Philpot,

Plaintiff,

v.

Jonathan Turley,

Defendant.

Case No. 1:20-cv-01349-CMH-MSN

DEFENDANT’S MOTION TO COMPEL DISCOVERY FROM PLAINTIFF

Pursuant to Fed. R. Civ. P. 37 and Local Civil Rule 37, Defendant Jonathan Turley (“Turley”), by and through undersigned counsel, hereby moves the Court for an order compelling Plaintiff Larry G. Philpot (“Philpot”) to respond to the Interrogatories and Requests for Production of Documents served upon him for all the reasons set forth in the accompanying Memorandum of Points & Authorities.

The undersigned hereby certifies that counsel for Turley attempted to confer in good faith with counsel for Philpot in an effort to obtain the discovery Turley seeks without involving the Court. On July 1, 2021, counsel for Turley provided counsel for Philpot with detailed responses to Philpot’s discovery objections that are the subject of this Motion. Counsel for Turley corresponded with Philpot’s counsel on July 1, 2021 and on July 2, 2021 via email in an attempt to resolve the parties’ disagreements or narrow the parties’ disagreements’, but the parties were unable to reach any agreement on these

matters. On July 2, 2021, counsel for Turley attempted to contact counsel for Philpot via telephone in a further effort to resolve this matter without involving the Court but was unable to reach her.

Dated: July 2, 2021

Respectfully submitted,

/s/
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Counsel for Defendant Jonathan Turley

CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2021, I filed the foregoing using the clerk's CM/ECF system, which will serve an electronic copy of this document on all counsel of record.

/s/
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